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10 *Attorneys for Plaintiffs Lynn Slovin, Samuel Katz,*
11 *Jeffery Price, and Justin Birkhofer, on their own*
behalf, and on behalf of all others similarly situated

12 **IN THE UNITED STATES DISTRICT COURT**
13 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

14 LYNN SLOVIN, an individual, on her own
15 behalf and on behalf of all others similarly
situated,

16 Plaintiff,

17 v.

18 SUNRUN, INC., a California corporation,
19 CLEAN ENERGY EXPERTS, LLC, a
California limited liability company doing
20 business as SOLAR AMERICA, and
DOES 1-5, inclusive,

21 Defendants.

No. 4:15-cv-05340-YGR

Honorable Yvonne Gonzalez Rogers

**NOTICE OF MOTION AND
UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS
SETTLEMENT**

Date: November 27, 2018

Time: 2:00 p.m.

Location: Courtroom 1
Ronald V. Dellums Federal Bldg.
1301 Clay Street
Oakland, California 94612

NOTICE OF MOTION FOR PRELIMINARY APPROVAL

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT on November 27, 2018 (or on any other date the Court may set) at 2:00 p.m., in Courtroom 1 in the Ronald V. Dellums Federal Building at 1301 Clay Street, Oakland, California 94612, before the Honorable Judge Yvonne Gonzalez Rogers, Plaintiffs Lynn Slovin, Samuel Katz, Jeffery Price, and Justin Birkhofer (collectively, “Plaintiffs”) will and hereby do move for preliminary approval of the class settlement with Defendants Sunrun, Inc. and Clean Energy Experts, LLC (collectively “Defendants”) under Rule 23(c) and (e) of the Federal Rules of Civil Procedure for entry of the submitted order which: (1) appoints Plaintiffs as the representatives of the Settlement Class; (2) appoints Class Counsel; (3) preliminarily approves the attached Settlement Agreement as fair, reasonable, and adequate; (4) approves the Settlement Agreement’s provisions for providing notice to the Settlement Class; (5) sets deadlines for Settlement Class Members to opt out and object, for Plaintiffs and Class Counsel to file their application for attorney’s fees, costs, and service award, and for the parties to file for final approval of the settlement; and (6) schedule a final approval hearing.

This Motion is based on this Notice of Motion and Motion, the Memorandum of Points and Authorities in Support of the Motion, the authorities cited therein and the supporting declarations, the attached Settlement Agreement, the Notice (including Website Notice, Direct Mail and Email Notice), and the proposed Orders for Preliminary and Final Approval, the oral argument of counsel, and any other matter that may be submitted at the hearing. Further, this Motion is made on the grounds that the Settlement Agreement is the product of arm’s-length, good-faith negotiations; is fair, reasonable, and adequate to the Settlement Class, and should be preliminarily approved, as discussed in the attached memorandum.

Dated: September 27, 2018

By: /s/David C. Parisi

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